

**REMARKS**

Claims 1, 3, 6-9, 11, 13, 16, and 21-22 have been amended. Claims 25-26 have been added. Claims 15 and 18 have been canceled. Claims 2, 10, 14, and 19-20 were previously canceled. Claims 1, 3-9, 11-13, 15-18 and 21-26 are currently pending in this application. Applicant reserves the right to pursue these and other claims in this and other applications.

Claims 6-9, 11, 12, 17, 18 and 22 stand rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. Claim 6 has been amended to remove “an image rendering device” in order to further prosecution of the application. Claims 18 has been canceled. Claims 7-9, 11, 12, 17 and 22 depend either directly or indirectly from claim 6. Withdrawal of this rejection is respectfully requested.

Claims 1, 4-8, 12, 23 and 24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Kim (U.S. Patent No. 6,320,668) (“Kim”). Reconsideration is respectfully requested.

Claim 1 recites an image correction method comprising, *inter alia*, “obtaining expected signals,” “obtaining detected signals ... for [a] plurality of known reference colors,” “determining an error measure for each of said plurality of known reference colors” where the error measure is calculated as the squared difference between expected color value signals and actual detected signals, “applying a weight factor to said error measure for each of said plurality of known reference colors to obtain a respective weighted error measure for each of said plurality of known reference colors,” and “obtaining a color correction matrix by simultaneously reducing the weighted error measure for each of said plurality of known reference colors.”

Claim 6 recites an image sensor apparatus comprising, *inter alia*, “an image sensor device” and “an image processor ... to color-correct images ... according to a color correction matrix obtained by simultaneously reducing respective weighted error measures, each of said weighted error measures being calculated by applying a weight factor to a squared difference between signals seen for a known reference color from said color image array of said image sensor device and signals expected to be seen for said reference color.”

Kim does not disclose or suggest applying a weight factor to the error measures to obtain a weighted error measure in order to correct some colors more than other colors, as is required by claims 1 and 6. Therefore, independent claims 1 and 6 should be allowable over Kim. Claims 4-5, 7-8, 12 and 23-25 depend from claims 1 and 6 and should be allowable as well. Accordingly, the Applicant respectfully requests the rejection of claims 1, 4-8, 12, 23 and 24 as being anticipated by Kim be withdrawn.

Claims 3, 9, 11, 13, 15-18, 21, 22 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Yamaguchi (Japanese Publication No. 02-074367 A) (“Yamaguchi”). Reconsideration of this rejection is respectfully requested.

Claim 13 recites a method of correcting an image comprising, *inter alia*, “obtaining signals expected to be seen for each of a plurality of known reference colors,” and “obtaining a color correction matrix for said pixels ... by simultaneously minimizing error measures relative to each color, wherein respective error measures ... are weighted such that said color correction matrix corrects for some ... colors more than ...[other] colors, each error measure representing a squared difference between signals actually seen for a known reference color ... and said signals expected to be seen for each of said reference outputs.”

As discussed above, Kim does not disclose or suggest the use of a weight factor applied to the error measures. While Yamaguchi uses the term "weighted" several times throughout, the approach is different than the approach in the present application. Yamaguchi does not use the minimization of weighted least squares of differences between expected signal values and detected signals in order to determine the values of the color correction matrix. In Yamaguchi, the color sample input data is weighted by copying the appropriate colors from the data group of 64 input colors to make a data group of greater than or equal to 65. The color with the most copies is "weighted" the highest in the correction process because there are more copies of this color. The present application applies a predetermined, subjective weight factor directly to the error measure (after the expected and detected signals have been compared) to obtain a weighted error measure. The weighted error measure is then used to obtain a color correction matrix. Therefore, the combination of Kim and Yamaguchi does not disclose or suggest the use of the weighted error measures recited by independent claims 1, 6 and 13.

Accordingly, independent claims 1, 6 and 13 should be allowable over Kim in view of Yamaguchi. Claims 3, 9, 11, 16-17, 21, 22 and 24-26 depend from claims 1, 6 and 13 and should be allowable as well. Applicant respectfully requests the rejection of claims 3, 9, 11, 13, 16-17, 21, 22 and 24 over Kim in view of Yamaguchi be withdrawn.

Applicant also notes that because independent claims 1 and 6 are allowable over Kim in view of Yamaguchi, that claims 4-5, 7-8, 12, 19 and 23 are allowable over Kim in view of Yamaguchi as well.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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